

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

*

v.

*

Criminal No.: GJH-17-0267

WILLIAM D. HILL

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* * * * *

POST-TRIAL MOTIONS PURSUANT TO F.R.CR.P 29&33

Comes now the Defendant, William D. Hill, through his counsel, Christopher C. Nieto, Esq., and hereby do move for a judgment of acquittal pursuant to F.R.Cr.P. 29(c) and for a new trial pursuant to F.R.Cr.P. 33, and in support thereof does set forth the preliminary grounds for these motions as follows:

On December 4, 2018, Mr. Hill had his initial appearance on the second superseding indictment in this case. An eight-day jury trial began on June 24, 2019, and the Court entered its verdict on July 3, 2019. Mr. Hill was convicted on all counts.

Subsequent to the verdict, Mr. Hill requested that his attorney file appropriate post-trial motions on his behalf. Regrettably, nothing was filed on Mr. Hill's behalf, and this miscommunication served as the partial basis to discharge prior counsel and appoint undersigned counsel to represent Mr. Hill.

Due to the unique circumstances surrounding the belated filing of these motions, the Government does not object to this untimely filing. Consequently, Mr. Hill now challenges his convictions on the grounds set forth herein:

I. The verdict was unsupported by adequate evidence to sustain a conviction beyond a reasonable doubt

Mr. Hill submits that the verdicts on were unsupported by adequate evidence to sustain the conviction to the standard of beyond a reasonable doubt.

II. The verdict was against the weight of the evidence

Mr. Hill submits that the verdicts were against the weight of the evidence adduced on said count.

III. Reassertion of grounds previously placed in the record

Mr. Hill hereby reasserts each and every ground previously set forth during trial and trial objections, as if fully set forth herein.

IV. Notice of further filings

Mr. Hill may file a more fully realized and individualized version of his respective post-trial motions, along with a memorandum of law discussing and expanding upon these issues more fully, insofar as applicable.

V. Stipulation of Opposition

Counsel believes that the government opposes this requested relief. In the view of the defense, the government need not file a response to this instant filing, with no allegation of default to be predicated on its silence, and need only file a response to the final defense filing if that is acceptable to the Court.

Respectfully submitted,

_____/s/_____
Christopher C. Nieto, Esq, #30031
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Baltimore, MD 21201
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Attorney for Mr. Hill

CERTIFICATE OF SERVICE

I hereby certify that on this 19th of September, 2019, a copy of the foregoing Motion was electronically filed with the Clerk of the United States District Court using CM/ECF, and a notice of said filing to Erin Pulice, Assistant United States Attorney.

_____/s/_____
Christopher C. Nieto, Esq.
Attorney for Mr. Hill